

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
JITENDRA VEKARIA,	:	Case No. 1:22-cv-03197-JPC
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
MTHREE CORPORATE CONSULTING, LTD.,	:	
JOHN WILEY & SONS, INC., ECI PARTNERS	:	
LLC, ALEX HEADLEY, BENJAMIN TOWN,	:	
THOMAS SEYMOUR, and RICHARD	:	
CHAPMAN,	:	
	:	
Defendants.	:	
-----X	:	

**DEFENDANTS JOHN WILEY & SONS, INC. AND MTHREE CORPORATE  
CONSULTING, LTD.'S NOTICE OF PARTIAL MOTION TO DISMISS**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendants John Wiley & Sons, Inc. ("Wiley") and Mthree Corporate Consulting, Ltd. ("Mthree"), by and through their undersigned counsel, respectfully move to dismiss Counts Three, Four, Seven, Eight, and Nine of Plaintiff Jitendra Vekaria's Complaint, and for other and further relief as the Court deems just and proper. In support, Wiley and Mthree submit a Memorandum of Law dated July 22, 2022, which is being filed contemporaneously with this motion.

Dated: Hoboken, New Jersey  
July 22, 2022

Respectfully submitted,

By: /s/ Kevin H. Kim  
Kevin H. Kim  
John Wiley & Sons, Inc.  
111 River Street  
Hoboken, New Jersey 07030  
Phone: (201) 748-5809  
Fax: (201) 748-6500

kkim2@wiley.com

*Attorney for Defendants John Wiley & Sons, Inc.  
and Mthree Corporate Consulting, Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 22, 2022, a copy of the foregoing Defendants John Wiley & Sons, Inc. and Mthree Corporate Consulting, Ltd.'s Notice of Partial Motion to Dismiss, and Defendants John Wiley & Sons, Inc. and Mthree Corporate Consulting, Ltd.'s Memorandum of Law in Support of Their Partial Motion to Dismiss were served upon the following counsel of record by the Court's CM/ECF system:

Travis Tatko  
Capell Barnett Matalon & Schoenfeld LLP  
1385 Broadway, 12th Floor  
New York, NY 10018  
212-661-1144  
Fax: 888-419-0650  
Email: travistatko@nysbusinesslaw.com

/s/ Kevin H. Kim  
Kevin H. Kim